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*Interim Lead Counsel for the
Direct Purchaser Plaintiffs*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. CV- 07-5944-SC

MDL No. 1917

This Document Relates To:

*Crago, d/b/a Dash Computers, Inc., et al. v.
Mitsubishi Electric Corporation, et al., Case
No. 14-CV-2058 (SC).*

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
DOCUMENTS PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(d)**

1 I, R. ALEXANDER SAVERI, declare as follows:

2 1. I am a member in good standing of the State Bar of California and the managing
3 partner at the law firm, Saveri & Saveri, Inc., Interim Lead Counsel for the Direct Purchaser
4 Plaintiffs. I make this declaration, except where noted, of my own personal knowledge, and, if
5 called upon to do so, I could and would testify competently to the facts contained herein.

6 2. I submit this Declaration in support of Plaintiffs' motion to file the following
7 documents (or portions thereof) under seal pursuant to Civil Local Rules 7-11 and 79-5(d):

- 8 • Gray highlighted portions of the Direct Purchaser Plaintiffs' Notice of Motion and
9 Motion for Class Certification with Respect to the Thomson and Mitsubishi Defendants;
10 Memorandum of Points and Authorities in Support Thereof that contain quotations or
11 information from documents that Defendants have designated "Confidential" or
12 "Highly Confidential";
- 13 • Gray highlighted portions of the Declaration of R. Alexander Saveri in Support of
14 Direct Purchaser Plaintiffs' Motion for Class Certification with Respect to the Thomson
15 and Mitsubishi Defendants that contain quotations or information from documents that
16 Defendants have designated "Confidential" or "Highly Confidential";
- 17 • Exhibits 1–2, 4, 15–136, and 138–139 to the Declaration of R. Alexander Saveri in
18 Support of Direct Purchaser Plaintiffs' Motion for Class Certification with Respect to
19 the Thomson and Mitsubishi Defendants that contain quotations or information from
20 documents that Defendants have designated "Confidential" or "Highly Confidential";
21 and
- 22 • The Expert Report of Jeffrey J. Leitzinger, Ph.D.

23 3. On June 18, 2008, the Court approved a "Stipulated Protective Order" ("Protective
24 Order") in this matter.

25 4. Section 10 of the Protective Order requires that "a Party may not file in the public
26 record in this action any Protected Material. A Party that seeks to file under seal any Protected
27 Material must comply with Civil Local Rule 79-5."

28 5. Plaintiffs seek to file the documents (or portions thereof) listed above in Paragraph 2
under seal pursuant to certain orders regarding the sealing of documents issued by this Court.

6. The documents (or portions thereof) listed in Paragraph 2 contain similar
information to the documents that were ordered filed under seal by this Court in connection with
Direct Purchaser Plaintiffs' Motion for Class Certification that was filed on May 14, 2013. *See*

1 Order Granting Direct Purchaser Plaintiffs' Administrative Motion to Seal Documents Pursuant to
2 Civil Local Rules 7-11 and 79-5(d) (May 29, 2013) (Dkt. No. 1698).

3 7. The documents (or portions thereof) that are identified in Paragraph 2 have been
4 designated as confidential by the SDI Defendants, the Hitachi Defendants, Defendant Chunghwa
5 Picture Tubes, Ltd., the Panasonic Defendants, the Philips Defendants, the Mitsubishi Defendants
6 and the Toshiba Defendants.

7 8. A stipulation by the parties could not be obtained because under Civil Local Rule
8 79-5, parties may not stipulate to the filing of any document under seal. See Civil L.R. 7-11(a), 79-
9 5(b).

10
11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct. Executed on November 7, 2014 in San Francisco, California.

13
14 /s/ R. Alexander Saveri

15 R. Alexander Saveri
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